

Exhibit 5

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3/30/2015

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

CASE NO:2:14-cv-11916

vs.

HENRY FORD HOSPITAL,

Defendant.

/

Volume I of the deposition of NATALIE
REESER, taken before me, Lauri A. Sheldon, CSR 4045, RPR,
on March 23, 2015, at 39500 High Pointe Boulevard, Suite
350, Novi, Michigan, commencing at or about 10:07 a.m.

APPEARANCES:

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<p style="text-align: right;">Page 149</p> <p>1 A Yes. I did this on a monthly basis for Martha Wiseheart, 2 my direct supervisor. 3 Q Okay. Your direct supervisor. 4 A She was one of my two direct supervisors, correct. 5 Q Oh, okay. 6 A This was a direct order from her to write down how many 7 patients I saw every day, keep a patient count, and to 8 watch it the whole time I worked there. 9 Q So when -- How long would you typically spend with a 10 patient? 11 A Between three to five minutes. 12 Q Three to five minutes. 13 A Have you ever had your blood drawn? It's three to five 14 minutes. 15 Q Three to five minutes. So if you had nine patients ... 16 Three to five minutes each. Okay. And your shift was 17 generally what? 18 A I worked ten-hour days for the first year and half, and 19 then I worked eight-and-a-half hour -- eight-hour days 20 for the last year and half, except for on Fridays where I 21 worked a half day. 22 (Exhibit 55 marked.) 23 Q (Continuing by Mr. Miglio): Let me show you what's been 24 marked as Exhibit 55 and ask you what this is. 25 A It's an agenda for the meeting in October 2013.</p>	<p style="text-align: right;">Page 151</p> <p>1 (Exhibit 57 marked.) 2 Q (Continuing by Mr. Miglio): I show you what's been marked 3 as Exhibit 57. What is this? 4 A This is the note -- or the note that I created that had 5 to be approved by Martha Wiseheart to go on our front 6 door in early -- I created this, I believe, in 2011, and 7 Fiona, if that is her writing there that says "Saw for 8 the first time after her termination," she used this on 9 the day I went to get my TB test read, so that would be a 10 lie. 11 Q Who used this? 12 A Fiona had this on the door -- or I had this on the door 13 the day I left for my TB test to be read. 14 Q Is that the day that Martha covered for you? 15 A Correct. Martha was also there. She also saw this. She 16 also watched me fill out the time that I thought I'd be 17 back and she -- she had to approve everything I put up on 18 the wall. 19 Q So what happened to the sign that you used that day? 20 A When you use a sign, because you have to fill out the 21 time, you shred the sign. Anytime that I made a 22 document, even if it was for Christmas, for Thanksgiving, 23 Martha approved the document, it went up, I'd get it 24 back, it would be destroyed, because it's covered in 25 tape.</p>
<p style="text-align: right;">Page 150</p> <p>1 Q And were you at that meeting? 2 A Yes. 3 Q Do you remember what was discussed at the meeting? 4 A No. 5 Q Do you remember what was discussed about breaks or 6 leaving the site or anything like that? 7 A No. 8 (Exhibit 56 marked.) 9 Q (Continuing by Mr. Miglio): I show you what's been marked 10 as Exhibit 56. What is this? 11 A This is a sign that I created that I had to get 12 permission from Martha Wiseheart to put up in the lunch 13 room so that if I wasn't at work or if I was out on CTO 14 one of my teammates that might cover for me could go in 15 and have whatever I had there. I was allowing them to 16 have it. 17 Q You were allowing other -- 18 A If I was going to be absent or take CTO time, they could 19 go in my drawer and have whatever they wanted. It was 20 just a note saying, "Hey, if you see something on the 21 counter and you want it, you can have it," because I was 22 awesome at being a teammate. 23 Q So this was just your offering other employees food that 24 you brought onto the site? 25 A Correct.</p>	<p style="text-align: right;">Page 152</p> <p>1 Q Threw the sign into the shredder. 2 A All signs go in the shredder. 3 Q Just as opposed to just crinkling it up and throwing it 4 in the garbage can? 5 A We shred everything at Clinton Township. 6 Q So how many times have you used this tiny sign? 7 A Five. 8 Q Five times. 9 A At least that I remember. Yes. 10 Q And those five times were the four that you identified 11 earlier? 12 A Correct. 13 Q Is it five or four times you recall putting a sign up? 14 A I'm sure it was more than that, but I just don't recall 15 the instances. 16 Q So -- 17 A But every time I left with the sign on the door Martha 18 Wiseheart was present, she saw the sign, she approved the 19 sign, and she was also one of my direct supervisors. 20 Q So when you had your TB test, where did the -- where was 21 the test given? 22 A Downtown. 23 Q Okay. 24 A It was read at Macomb. 25 Q And you said there was -- What were the other occasions</p>

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<p style="text-align: right;">Page 153</p> <p>1 when you left and put a sign up?</p> <p>2 A I really don't recall. I told you earlier.</p> <p>3 Q You don't recall the five times?</p> <p>4 A I testified earlier as to my five times, so you'll have</p> <p>5 to just look at the record for that. I don't know.</p> <p>6 Q Well, I'm asking you, on another occasion was Martha --</p> <p>7 on every occasion that you put the sign up did Martha</p> <p>8 approve it?</p> <p>9 A Martha approved the sign to be on my desk in the folder</p> <p>10 that are all approved signs. She wouldn't approve it</p> <p>11 every single time. She approved it when I created the</p> <p>12 sign.</p> <p>13 Q So my question is different than that. My question is</p> <p>14 are you saying that the five times that you left the</p> <p>15 site, according to you without permission, did you get --</p> <p>16 A I had her permission.</p> <p>17 Q -- authorization -- All right. So you're saying that you</p> <p>18 didn't leave the site without authorization; every time</p> <p>19 Martha gave you permission?</p> <p>20 A Martha was one of my direct supervisors. She gave me</p> <p>21 permission to leave the site. I left the site.</p> <p>22 Q My question is are you saying that you did not leave the</p> <p>23 site without permission, whether it be Martha or Fiona?</p> <p>24 MR. FLYNN: Objection. Asked and answered.</p> <p>25 THE WITNESS: Yes.</p>	<p style="text-align: right;">Page 155</p> <p>1 Q Okay. If you weren't leaving the site for an emergency,</p> <p>2 were there situations where you didn't need to get Fiona</p> <p>3 or Martha's permission?</p> <p>4 A I always asked for permission just -- from Martha because</p> <p>5 she was there.</p> <p>6 Q Okay. So are you saying you never left the site for</p> <p>7 whatever reason without getting Martha or Fiona's</p> <p>8 permission? Is that what you're saying?</p> <p>9 A Up to the new policy that came out on February 24th,</p> <p>10 correct.</p> <p>11 Q All right. Up to the new policy. All right. So up to</p> <p>12 February 24th whenever you left the site for whatever</p> <p>13 reason you got permission to do so from either Martha or</p> <p>14 Fiona, correct?</p> <p>15 A Yes.</p> <p>16 Q All right.</p> <p>17 (Exhibit 58 marked.)</p> <p>18 Q (Continuing by Mr. Miglio): Tell me what this is.</p> <p>19 A Another just one that I created for my coworkers. They</p> <p>20 let me hang it up. So this one was in the break room.</p> <p>21 That one was in -- at my desk. So that's what this is.</p> <p>22 It is being a good teammate. It is allowing your</p> <p>23 teammates to eat your food when you're not there.</p> <p>24 (Exhibit 59 marked.)</p> <p>25 Q (Continuing by Mr. Miglio): Let me show you what's been</p>
<p style="text-align: right;">Page 154</p> <p>1 Q (Continuing by Mr. Miglio): You're saying yes, you</p> <p>2 didn't; unless you had permission, right?</p> <p>3 MR. FLYNN: Same objection.</p> <p>4 THE WITNESS: For occasions that I would have</p> <p>5 to leave and leave my desk, yeah.</p> <p>6 Q (Continuing by Mr. Miglio): Okay. So every time you left</p> <p>7 you got Fiona's permission or Martha's permission,</p> <p>8 correct?</p> <p>9 MR. FLYNN: Same objection.</p> <p>10 THE WITNESS: If it was a break or if it was an</p> <p>11 emergency situation, yes.</p> <p>12 Q (Continuing by Mr. Miglio): So if it wasn't a break or it</p> <p>13 wasn't an emergency situation and you were leaving the</p> <p>14 facility, then you didn't get their permission?</p> <p>15 A You can't leave the facility. You're responsible for the</p> <p>16 site. I was responsible for Clinton Township. I never</p> <p>17 left the site.</p> <p>18 Q Okay. That's not what I'm asking you.</p> <p>19 A I don't understand your question, sir.</p> <p>20 Q Well, we'll break it down so you understand it.</p> <p>21 A Okay.</p> <p>22 Q So if you had to leave the site for an emergency, is it</p> <p>23 your testimony that you needed to get Fiona's or Martha's</p> <p>24 permission?</p> <p>25 A Yes, because then you'd be using CTO time.</p>	<p style="text-align: right;">Page 156</p> <p>1 marked as Exhibit 59.</p> <p>2 A Okay.</p> <p>3 Q What is this about?</p> <p>4 A Fiona changed my performance review based upon me having</p> <p>5 3 people out of the 3,000-some-odd people I saw that year</p> <p>6 getting bruises, and I felt that was wrong.</p> <p>7 Q That was wrong because what, she rated you as a two or</p> <p>8 something?</p> <p>9 A Correct, which is unsatisfactory.</p> <p>10 Q Okay.</p> <p>11 A Which if you do 3,000 blood draws and you have 3</p> <p>12 complaints out of 3,000 blood draws, that's 1 percent.</p> <p>13 Q And that was the evaluation for what year?</p> <p>14 A That was evaluation for 2014. You may have one that says</p> <p>15 3.0, because Jill Hood changed it, but the one she sent</p> <p>16 me says 2.0.</p> <p>17 (Exhibit 60 marked.)</p> <p>18 Q (Continuing by Mr. Miglio): So let me show what you</p> <p>19 what's been marked as Exhibit 60 and ask you to take a</p> <p>20 look at that.</p> <p>21 MR. FLYNN: Fully review it.</p> <p>22 THE WITNESS: God. Okay. Okay.</p> <p>23 Q (Continuing by Mr. Miglio): What is that?</p> <p>24 A My performance review from 2014.</p> <p>25 Q And so what were you taking objection to?</p>

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<p>1 MR. FLYNN: Objection as to form.</p> <p>2 MR. MIGLIO: Did you? Look at the email. I</p> <p>3 mean can you read it?</p> <p>4 MR. FLYNN: Would you like to point out a</p> <p>5 specific email?</p> <p>6 Q (Continuing by Mr. Miglio): Yeah, the January 16th email.</p> <p>7 A Which one?</p> <p>8 Q At 4:48.</p> <p>9 A I was already set to go down, which means my coverage had</p> <p>10 already been approved. Where is the approval letters</p> <p>11 from Fiona? That should be an exhibit with this. If</p> <p>12 you're going to question me about that, you should have</p> <p>13 all documents that go with it.</p> <p>14 Q Okay. Now, are you willing to -- ready to answer my</p> <p>15 questions?</p> <p>16 A I...</p> <p>17 Q Okay? Just take your time.</p> <p>18 A I don't know what I'm doing wrong, so.</p> <p>19 Q Just take your time and listen to my question and I'll</p> <p>20 ask you. Okay?</p> <p>21 A Hm-hmm. Go ahead.</p> <p>22 Q So my question is isn't it true that you didn't confirm</p> <p>23 your meeting with Jill Hood until after you were notified</p> <p>24 of the conference call?</p> <p>25 A No, because I spoke verbally with Fiona that day on the</p>	<p>1 MR. FLYNN: Objection. Asked and answered.</p> <p>2 Q (Continuing by Mr. Miglio): Huh? You never got</p> <p>3 permission from Fiona to attend the meeting at HR on</p> <p>4 January 17th after 12:30, did you?</p> <p>5 A Yes. It's in the email somewhere.</p> <p>6 Q You got permission.</p> <p>7 A I have it in my phone, the email that says "approved."</p> <p>8 MR. FLYNN: It's been turned over.</p> <p>9 THE WITNESS: It's been turned over to you.</p> <p>10 You have the documentation.</p> <p>11 Q (Continuing by Mr. Miglio): Well, if you read through the</p> <p>12 email, Jill Hood doesn't even meet with you.</p> <p>13 A I keep explaining to you, this is not complete. There's</p> <p>14 missing emails. So if you want to keep questioning me</p> <p>15 about that, you might want to bring me the documents that</p> <p>16 I need to answer the question properly.</p> <p>17 Q Show me where you got approval.</p> <p>18 MR. FLYNN: Is there any email in here that</p> <p>19 states that you got approval from Fiona?</p> <p>20 Q (Continuing by Mr. Miglio): Now you're saying it was a</p> <p>21 text message?</p> <p>22 A No. It was an email from Fiona approving me.</p> <p>23 Q Didn't you just say it was a text message?</p> <p>24 A I did not say a text message.</p> <p>25 Q Where is the email approving you? Have you seen it yet</p>
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<p>1 15th when she was in the office humming and singing and</p> <p>2 harassing me. I let her know that I wouldn't meet with</p> <p>3 her because I had a meeting Friday with Jill Hood at</p> <p>4 12:30. And Jill confirms that she --</p> <p>5 MR. FLYNN: No. Wait for there to be a</p> <p>6 question.</p> <p>7 THE WITNESS: She --</p> <p>8 Q (Continuing by Mr. Miglio): So where do you say</p> <p>9 that... Where do you say that that's what happened</p> <p>10 with Fiona learning about the meeting? Show me that</p> <p>11 email.</p> <p>12 A Right here on the 15th at 12:31 p.m. She came to my</p> <p>13 office earlier that day and I told her I had a meeting on</p> <p>14 Friday at 12:30 with Jill Hood, the HR representative.</p> <p>15 Q You told her that.</p> <p>16 A Hm-hmm. Sure did.</p> <p>17 Q Is that right?</p> <p>18 A Yes. And I did not meet with her.</p> <p>19 Q So why would you say in this email, "I will get back to</p> <p>20 you asap about Friday 12:30 as soon as I know something</p> <p>21 again"? Why would you say something like that if it was</p> <p>22 all straightened out? Can you tell me that?</p> <p>23 A That was about Alicia Estell being able to cover me.</p> <p>24 Q Okay. Let's try this: Isn't it true that you never got</p> <p>25 permission to go to that meeting?</p>	<p>1 today?</p> <p>2 A No. I'm waiting for it to come up in your exhibits, and</p> <p>3 then I will point out that it connects to 67.</p> <p>4 Q So your testimony today under oath is that you did not</p> <p>5 confirm -- that you confirmed with Jill Hood that you</p> <p>6 would meet her on 12 -- at 12:30 p.m. on July 17th before</p> <p>7 you were informed by Fiona that you had you a conference</p> <p>8 call that was --</p> <p>9 A Yes, absolutely.</p> <p>10 Q Okay.</p> <p>11 A One hundred percent.</p> <p>12 Q And your testimony also is that Fiona approved you to go</p> <p>13 to the meeting with Jill Hood.</p> <p>14 A Yes, she did.</p> <p>15 Q Okay.</p> <p>16 A However, she didn't send the approval to the coverage.</p> <p>17 That's the text message from Alicia Estell that you see.</p> <p>18 Q So it's a text.</p> <p>19 MR. FLYNN: The document we produced --</p> <p>20 THE WITNESS: Today.</p> <p>21 Q (Continuing by Mr. Miglio): All right. Well, we can look</p> <p>22 at that.</p> <p>23 A Okay. Let's look at it.</p> <p>24 MR. FLYNN: Hold on. Wait for it to be marked</p> <p>25 as an exhibit.</p>

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<p>1 Q Yeah, she was telling you you shouldn't be reading the 2 news. 3 A Hm-hmm. 4 Q Right? 5 A Correct. 6 Q Okay. And you say here -- 7 A Just to clarify that, that was earlier in 2011/2012. 8 Q "Both she and our operations manager have viewed this 9 screen for months, and no one has ever mentioned it in 10 the past." See that? 11 A Yes. 12 Q And the operations manager is who? 13 A Martha Wiseheart. 14 Q Why didn't you just say "Martha Wiseheart, my direct 15 supervisor"? 16 A Because I didn't type this letter, sir, my mom did, so 17 she probably wrote "operations manager" instead of 18 "Martha Wiseheart." 19 Q How would your mom know what to write unless you told 20 her? 21 A Mom was well aware that Martha Wiseheart was the 22 operational manager. 23 Q So your mother just composed this letter. Did you read 24 it before you sent it? 25 A Yep. Yes.</p>	<p>1 2011 from 2 to 5 patients a day to 20 patients a day, and 2 that was one of my goals. However, Fiona deleted that 3 at -- on my 2013 one, but allowed it for 2012 and 2011, 4 because she was informed by Jill Hood that it was 5 inappropriate for her to allow me to have a goal like 6 that or something. 7 Q So she deleted a goal that you had to do what? 8 A To grow Clinton Township's patients. 9 Q Okay. And you objected to her deleting the goal. 10 A Correct, because I had been allowed to have that goal for 11 two years and then all the sudden she deleted it. So 12 when she went to HR, HR told her that is a good thing she 13 deleted it because it was irrelevant to me because I'm 14 not a salesperson. 15 Q Wasn't the goal deleted after she went to HR? 16 A No. I do believe it was deleted before. 17 Q Didn't she respond to your complaint about being rated 18 inappropriately? 19 A I did not have a response from Fiona about her 20 accidentally marking me down to a two until I had already 21 met with HR and was already on suspension. 22 (Exhibit 70 marked.) 23 Q (Continuing by Mr. Miglio): Look at Exhibit 70. Have you 24 ever seen this before? 25 A Yes.</p>
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<p>1 Q Okay. Now, "Also, based on emails I received last week, 2 I believe my supervisor altered or deleted goals that 3 were part of the original evaluation." 4 A For -- 5 Q Now, when you say "my supervisor," who were you referring 6 to? 7 A The person who writes my reviews. That would be Fiona 8 Bork. 9 Q My supervisor. 10 A When she writes performance reviews, she does the 11 performance reviews. That makes her that supervisor over 12 that portion of my job. 13 Q And so you say you don't know whether there was one or 14 two goals or what. 15 A Correct. 16 Q What does that mean, "altered or deleted"? 17 A For two years she allowed me to have a goal that I wanted 18 to raise the level of patients through repeat customers, 19 because one of the things that I had going for me there 20 that destroyed me was that I built a relationship base 21 with all the these customers. I had repeat customers on a 22 daily basis and -- What was the question, I'm sorry? 23 Q I said what was the goal you thought she deleted? 24 A Oh. And I -- The goal was that I wanted to build the 25 laboratory up from, you know, when I first started in</p>	<p>1 Q If you look at the second page, the second bullet point. 2 MR. FLYNN: Do you mean above "Unemployment 3 hearing," counsel? 4 MR. MIGLIO: Yes. 5 Q (Continuing by Mr. Miglio): It says, "Regarding the 6 altered or deleted goal." Do you see that? It says, "As 7 I shared with you at our meeting on January 20th, 2014, 8 after reviewing your performance evaluation I noticed 9 that you had a goal of," quote, "to grow CTPSC to 20-plus 10 customers as day," close quote. Did you have that goal? 11 A Yes. That is the goal that I had since 2011. 12 Q So she says, "The volume per day for 2013 didn't reach 13 that goal, and therefore you received a 2 -- a score of 2 14 with a 5 percent weight." 15 A Then, according to this, she marked down two of my 16 performance goals to two. 17 Q "Since that goal was not within your direct control and 18 since the score was less than satisfactory, I requested 19 that this goal be deleted and that the 5 percent weight 20 be attributed to another goal, which ultimately raised 21 your overall performance score." See that? 22 A Okay. 23 Q So you just said you were complaining because she -- that 24 Fiona removed a goal that you were supposed to be working 25 for and, in actuality, it was Jill Hood who removed the</p>

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<p>1 question?</p> <p>2 MR. MIGLIO: Yeah, I'll withdraw the question.</p> <p>3 She answered it.</p> <p>4 THE WITNESS: Okay.</p> <p>5 Q (Continuing by Mr. Miglio): What is Exhibit 72A?</p> <p>6 A This is a card and a gift card that Martha gave me for</p> <p>7 doing her work.</p> <p>8 Q Gift card that she gave you.</p> <p>9 A Yeah. She gave me a \$15 gift card to Subway for her</p> <p>10 thanking me for all of the work -- administrative</p> <p>11 assistant work that I do for her.</p> <p>12 Q Why would you think you needed to copy this and make</p> <p>13 these notations on it?</p> <p>14 A Because it shows that I was doing extra work and it also</p> <p>15 shows that I didn't have a problem doing extra work, and</p> <p>16 it also shows that Martha gives me a direct order, I</p> <p>17 follow it.</p> <p>18 Q How does this --</p> <p>19 A She's thanking me.</p> <p>20 MR. FLYNN: Counsel, why are you laughing?</p> <p>21 Q (Continuing by Mr. Miglio): Show me where on --</p> <p>22 A It's not funny.</p> <p>23 Q -- this card with the \$15 gift certificate from Subway it</p> <p>24 proves that Martha was giving you orders and you were</p> <p>25 following them? How do you get to that from there?</p>	<p>1 started keeping things back three years before your</p> <p>2 termination.</p> <p>3 A I kept this card because it was an appreciation and I</p> <p>4 thought it was important, so I put it up on the wall.</p> <p>5 Q So now you want to say that it's evidence that you were</p> <p>6 given direct orders to do her work. Is that what I'm</p> <p>7 getting from you?</p> <p>8 MR. FLYNN: Objection. Asked and answered.</p> <p>9 Q (Continuing by Mr. Miglio): Right?</p> <p>10 A This card was a thank you for doing her work, correct.</p> <p>11 Q Yeah, and you were mad that you had to do it, right?</p> <p>12 MR. FLYNN: Objection. Misconstruing her</p> <p>13 testimony. She actually testified to the exact opposite.</p> <p>14 THE WITNESS: If I was mad, I wouldn't have</p> <p>15 been happy to do the work that she directed me to do,</p> <p>16 sir.</p> <p>17 (Exhibit 73 marked.)</p> <p>18 Q (Continuing by Mr. Miglio): Let me show you what's been</p> <p>19 marked as Exhibit 73. Before I ask you that question,</p> <p>20 what's the longest job -- what's the longest period of</p> <p>21 time you've held a single job?</p> <p>22 A I don't recall. I have no clue.</p> <p>23 Q Have you ever worked anywhere for more than four years?</p> <p>24 A Yes.</p> <p>25 Q Where would that be?</p>
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<p>1 A Because she gave me a direct order to do something for</p> <p>2 her, I did it, and she gave me a card.</p> <p>3 Q What was the direct order she gave you?</p> <p>4 A I did some administrative assistant thing for her. I</p> <p>5 typed up something, I remember, and it took me a long</p> <p>6 time to type it up for her, it was her job, she didn't</p> <p>7 want to do it, she gave it to me -- she delegated it to</p> <p>8 me -- I did it, and she went out and got me a card and</p> <p>9 bought me a \$15 gift card.</p> <p>10 Q So we'll find what it is. What was it you typed up? It</p> <p>11 was that extensive, you presumably remember what it was</p> <p>12 A I have no clue.</p> <p>13 Q You don't remember at all.</p> <p>14 A Nope. This was back in 2011.</p> <p>15 Q So in 2011, three years before your termination, you</p> <p>16 thought it was significant enough to keep a card that she</p> <p>17 gave you, make copies of it, and make notations.</p> <p>18 A Yep.</p> <p>19 Q As early as 2011 in your employment you were keeping</p> <p>20 track of this stuff.</p> <p>21 A I keep everything. I'm a very organized person. And I</p> <p>22 happened to have the card sitting there, so I made a</p> <p>23 copy. It sat on my wall at my office for three years.</p> <p>24 I'm sorry you feel that it's irrelevant.</p> <p>25 Q I didn't say it was irrelevant. I just wondered why you</p>	<p>1 A Moore Home Improvement. I was the office manager there</p> <p>2 Q And you worked there from what period of time to what</p> <p>3 period of time?</p> <p>4 A I have no clue.</p> <p>5 Q You don't know how long you worked there or what time</p> <p>6 period, but you know it was more than --</p> <p>7 A I told you I worked there almost four years, but,</p> <p>8 however, I don't remember the exact dates I worked there,</p> <p>9 sir. It was a long time ago.</p> <p>10 Q All right. So we looked at 73. So tell me what this is.</p> <p>11 MR. FLYNN: Read the whole document from</p> <p>12 beginning to end.</p> <p>13 THE WITNESS: Is it backwards?</p> <p>14 MR. FLYNN: Yeah.</p> <p>15 THE WITNESS: Okay. Hm-hmm. Okay.</p> <p>16 Q (Continuing by Mr. Miglio): Done reading it?</p> <p>17 A Yes. Yes.</p> <p>18 Q So Jill Hood was apparently asking you what you -- what</p> <p>19 Fiona told you to lie about at the unemployment hearing.</p> <p>20 MR. FLYNN: Objection. Misconstrues the</p> <p>21 document in question.</p> <p>22 Q (Continuing by Mr. Miglio): Is that correct?</p> <p>23 A I didn't hear -- understand your question or hear it</p> <p>24 properly. What did you say?</p> <p>25 Q Well, she says here on page 122, "Natalie, I understand</p>

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<p>1 that she requested that you participate in the hearing.</p> <p>2 Did she, however, ask that you provide false information</p> <p>3 at the hearing?" And your answer was on January 24th at</p> <p>4 7:31 a.m., "Yes, she did."</p> <p>5 A Hm-hmm.</p> <p>6 Q And then Jill responds at 7:37 a.m. on that same day,</p> <p>7 "What specifically did she ask you to say?"</p> <p>8 A Right. And in my email --</p> <p>9 Q I didn't ask you yet.</p> <p>10 A Oh.</p> <p>11 Q So you write here, "Unless I'm able to read what she had</p> <p>12 me write, I don't want to confirm anything, because I</p> <p>13 don't want it used against me." What did she have you</p> <p>14 write?</p> <p>15 A A statement.</p> <p>16 Q Okay. A statement. What kind of a statement?</p> <p>17 A Of what happened that day.</p> <p>18 Q In an email or what?</p> <p>19 A I don't recall.</p> <p>20 Q "This was almost three years ago. I only have brief</p> <p>21 memories, but I never forgot she asked me to say she quit</p> <p>22 and that I heard her call her a B and that Judy was</p> <p>23 swearing at Fiona."</p> <p>24 A Hm-hmm.</p> <p>25 Q Okay. So that sounds to me like Fiona was asking you to</p>	<p>1 Judy Hale call Fiona a bitch?</p> <p>2 A Yes.</p> <p>3 Q Okay. Did you -- Did Fiona ask you to say that Judy was</p> <p>4 swearing at Fiona?</p> <p>5 A Yes, because that's all true.</p> <p>6 Q Okay. So how did this get misconstrued?</p> <p>7 A I did not mean to say "Made to say." I was under so much</p> <p>8 stress writing these emails back and forth about Fiona</p> <p>9 being -- harassing me and I was going through so much</p> <p>10 reporting Henry Ford to the State that I added some extra</p> <p>11 words in there, but that's not what I meant, and she</p> <p>12 understood that when I met her face to face, so why all</p> <p>13 this is coming out now, I don't know.</p> <p>14 Q Well, what did she misconstrue? What did you mean to</p> <p>15 say?</p> <p>16 A I told her that what I wrote I can't confirm, because who</p> <p>17 knows if Fiona changed it or not. However, the thing I</p> <p>18 didn't want to do was testify against her at her</p> <p>19 unemployment meeting. It had nothing to do with what I</p> <p>20 wrote being false. That's what I'm confused as to why</p> <p>21 this is all coming out as she said she -- it's false. I</p> <p>22 told her I misconstrued that. I misunderstood that whole</p> <p>23 situation.</p> <p>24 Q Misunderstood what whole situation?</p> <p>25 MR. FLYNN: Objection. Form.</p>
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<p>1 say that Judy quit and that you heard Judy call Fiona a</p> <p>2 bitch.</p> <p>3 A No. I miswrote this, and the way I wrote it it's</p> <p>4 misconstrued, and I meant to say I remember her saying</p> <p>5 that she asked -- that she quit and called her a B. I</p> <p>6 wrote that wrong. That's my thing. I was going to her</p> <p>7 to tell her that I didn't want to testify in the meeting.</p> <p>8 This is what is getting confused. You guys keep saying I</p> <p>9 keep saying that I didn't mean that. Well, this email</p> <p>10 right here I misspoke, because that's not what I meant to</p> <p>11 say.</p> <p>12 Q Well, what did you mean to -- Well, first of all, did she</p> <p>13 ask you to say that Judy Hale quit? Did Fiona ask you to</p> <p>14 say that?</p> <p>15 A I didn't mean to write "Asked me to say." I meant to</p> <p>16 say, "But I never forgot she said she quit and called her</p> <p>17 a B."</p> <p>18 Q Just listen to my question and we'll get through this a</p> <p>19 lot quicker. Did Fiona ask you to say that Judy Hale had</p> <p>20 quit?</p> <p>21 MR. FLYNN: So did she ask you specifically to</p> <p>22 say --</p> <p>23 THE WITNESS: No.</p> <p>24 Q (Continuing by Mr. Miglio): Okay. Did she ask you, did</p> <p>25 Fiona ask you, to say that you -- she -- that you heard</p>	<p>1 Q (Continuing by Mr. Miglio): I mean did you misunderstand</p> <p>2 Jill Hood's question when she said, "Did she, however,</p> <p>3 ask that you provide false information at the hearing?"</p> <p>4 And your answer was, "Yes, she did." Now, did you</p> <p>5 misunderstand that question?</p> <p>6 A Yes, she did. However, it -- this is . . .</p> <p>7 Q No. I just asked you if you misunderstood Jill Hood's</p> <p>8 question --</p> <p>9 A Yes.</p> <p>10 Q -- she asked you.</p> <p>11 A Yes. Obviously, I did. Well, no, I didn't. I</p> <p>12 understood the question. I just accidentally added in,</p> <p>13 "She asked me," and I didn't mean to write that. I must</p> <p>14 have been typing fast.</p> <p>15 Q Then she says --</p> <p>16 A There's a lot of typos in my emails.</p> <p>17 Q She said, "What specifically did she ask you to say?"</p> <p>18 And then after saying that "I don't want to confirm</p> <p>19 anything, because I don't want it used against me since</p> <p>20 it's almost three years ago, I only have brave memories,</p> <p>21 but I never forgot she asked me to say she quit and that</p> <p>22 I heard her call her a bitch and that Judy was swearing</p> <p>23 at Fiona. For some reason these points never left my</p> <p>24 head."</p> <p>25 A Hm-hmm.</p>

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<p style="text-align: right;">Page 257</p> <p>1 says, that there wasn't any Atlas activity after 3 p.m. 2 MR. FLYNN: Read the whole thing, Natalie, from 3 beginning to end. 4 THE WITNESS: I did. Okay. 5 Q (Continuing by Mr. Miglio): So what do you make of this? 6 Somebody's criticizing you for not doing your work, it 7 sounds like. 8 A Actually, I was doing copy to's and other administrative 9 insurance updates, so just because Atlas isn't active 10 doesn't mean I'm not working. 11 Q Well, did you tell her that you weren't -- that you 12 didn't do any regs after she called at 16:38? 13 A I don't know. It depends on my workload that day and 14 what I was doing. I don't remember this or recall this 15 particular day. I have no clue. 16 Q So were you doing . . . So the original email from Fiona 17 says, "Today there was over an hour without any patient 18 activity that could have been used at the end of the day 19 to register patients." And that's what you got all angry 20 about, is it? 21 A That would be in her opinion. However, the workload that 22 I had at Clinton Township took me to the end of the day. 23 Q Well, it sounds to me like you're saying no, there 24 wasn't -- just because there wasn't activity, I was doing 25 the regs.</p>	<p style="text-align: right;">Page 259</p> <p>1 would give me extra work. 2 MR. FLYNN: Read this document carefully, 3 Natalie. 4 THE WITNESS: Okay. 5 Q (Continuing by Mr. Miglio): What is that about? 6 A That's about all the issues they were having at Shelby. 7 Q Okay. You received a copy of that? 8 A Correct. 9 Q Did you think it had application to you? 10 A It all applies to me, except for the fact that I'm not 11 the reason this email came out. The reason this email 12 came out is because they were having too many problems at 13 Shelby. My office didn't have defects. 14 Q What kind of defects did they have at Shelby? 15 A They were stacking the labels. They weren't labeling in 16 front of the patient. They were running in and out of 17 the rooms, switching people. I mean it -- Shelby's a 18 mess. And these are the two PSC people, and I run 19 Clinton Township PSC, and this was directed towards the 20 Shelby Township PSC, if you see "Shelby Patient Safety 21 Procedure," because the Shelby Office was having defects. 22 I was copied to because I run a PSC. 23 (Exhibit 79 marked.) 24 Q (Continuing by Mr. Miglio): Let me show you what's been 25 marked as Exhibit 78 (sic).</p>
<p style="text-align: right;">Page 258</p> <p>1 A I was doing the insurance updates. 2 Q Well, I don't see that here. 3 A I mean -- 4 Q You said, "I did the regs when I could. There wasn't a 5 point when I got to sit down yesterday." 6 A Correct. 7 Q So you're saying that now you weren't doing the regs 8 after -- during that time period of inactivity; you were 9 doing something else. 10 A I was probably doing another administrative directly 11 directed by Martha Wiseheart. 12 Q What do you remember that to be? 13 A Could have been anything. She had me do a lot. 14 (Exhibit 78 marked.) 15 Q (Continuing by Mr. Miglio): I show you what's -- 16 A Almost every day she had a direct order to do something 17 that she was supposed to do. 18 Q Let me show you what's been marked as Exhibit 78. Well, 19 what can you remember that we can go and find that you 20 were doing for her that would show that she was given -- 21 A All of her insurance updates. 22 Q Okay. Insurance updates, what are those? 23 A Correct. No other lab assistant did any insurance 24 updates. Just me. And that was because I asked her is 25 there anything else I can do to help you today and she</p>	<p style="text-align: right;">Page 260</p> <p>1 A Yes. 2 Q So this is an email at the bottom here that you sent to 3 Fiona, Luain and Martha at -- 4 MR. FLYNN: I hate to interrupt you, but the 5 exhibit's misnumbered again. The earlier one, I believe, 6 was 78. 7 MR. MIGLIO: Let me get that back. 8 Q (Continuing by Mr. Miglio): All right. Let me show you 9 what we marked as Exhibit 79. 10 A Okay. 11 Q So the email that's on here, "I'm very upset. I'm 12 putting a note on the door. I'm taking a 30-minute lunch 13 today." That's an email that you sent to Fiona, Luain, 14 and Martha. 15 A Correct. 16 Q At 1:12 on September 25th. 17 A Yes. 18 Q Okay. What time did you start work that day? 19 A 7:30 a.m. 20 Q And what happened after you started work? 21 A I got a phone call from Fiona Bork. 22 Q Okay. 23 A Explaining to me that I think I'm some superior person or 24 something because I went to HR about her, but that I'd be 25 sorry and she hung up on me. She told me -- Oh, before</p>

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<p>1 she hung up on me she told me she was changing my site, 2 and I informed her on that phone call that I planned on 3 taking a lunch that day from the new policy the day 4 before, and she never once said anything about the lunch 5 policy not being -- not allowing me to go. 6 Q Okay. So let's get this it straight. So you're working 7 and she calls you. 8 A Yes. 9 Q And she calls you on what phone? 10 A I don't know if it was the office phone, my work phone, 11 or my cell phone. 12 Q Okay. So you don't know whether it was the office phone, 13 your work phone, or your cell phone. 14 A Correct. 15 Q And did you see what the number was that she was calling 16 from? 17 A I don't recall. 18 Q What time did she call? 19 A Sometime in the morning. 20 Q Okay. And tell me exactly what she said. 21 A Just the facts of that I'm going to be sorry. I think 22 she thought that -- 23 Q I don't want to know what she thought. I just want to 24 know what she said. 25 MR. FLYNN: Just go bit by bit through that</p>	<p>1 A She said, "How dare you go to the State?" She was -- She 2 was upset that I told on her for not giving me a lunch 3 and she thought that was rude and not very friendly and 4 I'm not very team like, and she was calling me names and 5 telling me how sorry I'm going to be, and she hung up on 6 me after I told her that I was going to take a lunch. 7 Q So let's explore that. She said how angry she was about 8 you going to the State? 9 A Going to HR. 10 Q Well, which is it? Is it the State or HR? 11 A To me they're both the same thing. HR. 12 Q So did she say "State" or "HR"? 13 A She said going to HR about her. 14 Q Okay. And she said she was angry that you went to HR 15 about her. 16 A Yes. 17 Q About her. 18 A Yes. 19 Q Okay. And what had happened up until that point with the 20 human resources investigation about whether or not you 21 should have gotten paid or not? 22 A They ignored me for a month straight. I sent them emails 23 asking for direction. I got emails from Martha stating 24 she wasn't going to pay me. I got emails from Fiona 25 saying, "Lunches are mandatory. Why aren't you taking</p>
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<p>1 conversation now. 2 THE WITNESS: Basically it was how dare you 3 think that you can go to HR on me. How dare you think 4 that you, you know -- I don't . . . I don't recall word 5 for word what she said, but she was saying things like, 6 "You're going to be sorry," and that she wasn't going to 7 pay me for my lunches prior to that day. 8 Q (Continuing by Mr. Miglio): Did you make a note of that 9 conversation? 10 A I emailed her right after that conversation and I asked 11 her, "Is this move permanent or is this move" -- because 12 she told me on the phone conversation she was moving me, 13 so I wanted to know if my move was permanent or 14 temporary. 15 Q All right. What else did she say during the 16 conversation? 17 A She was just angry and . . . I don't . . . I don't recall 18 it word for word. 19 Q Okay. And you say she said something about paying you? 20 A I meant to also cc the HFML outreach that was in the new 21 email address that we were supposed to sign out our lunch 22 at, but . . . because they had been informed by the State 23 a month earlier. 24 Q I don't care about that. What I'm asking you about is 25 what else did she say to you during that conversation?</p>	<p>1 lunches?" But then in another state (sic) she's saying, 2 "Take a lunch and it's insubordination," so. 3 Q So in other words, when you had this conversation with 4 her are you saying you didn't know whether you were going 5 to get paid or not? 6 A I knew at that point I was not getting paid for lunches, 7 correct. 8 Q Did you know whether Henry Ford Health System was going 9 to pay you or not? 10 A At this time, this day, when I wrote this email, no, 11 they -- I did not know. 12 Q Okay. 13 A Jill Hood said they were doing an investigation and 14 looking into paying me, but never once did anyone tell me 15 they were directly going to pay me. 16 Q Okay. So what happened after the phone call? 17 A Martha came out of her office and I spoke with her. 18 Q What did you say to her? 19 A I told her what was going on with Fiona, what Fiona said 20 on the phone. She gave me a hug. 21 Q What did you say to her exactly? 22 A I told her that she was yelling at me. I told her that 23 she was upset because I reported the lunch piece, because 24 she thinks that she's all high and mighty and she doesn't 25 have to follow any rules, she makes up her own rules, and</p>

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<p style="text-align: right;">Page 265</p> <p>1 she basically gave me a hug, she told me she was so sorry</p> <p>2 that I was going through that, and she also told me to go</p> <p>3 to HR again.</p> <p>4 Q Okay. And then what happened?</p> <p>5 A And then I went back to my desk. I sent this email. I</p> <p>6 proceeded to get my purse. I went back to the break room</p> <p>7 where my purse and my coat and stuff was. I picked that</p> <p>8 up. I looked in the room. Waved to Martha. Martha</p> <p>9 waved to me. I walked out.</p> <p>10 Q Where did you go?</p> <p>11 A I went and sat in my car for 30 minutes and cried.</p> <p>12 Q Okay. And who was taking care of the patients while you</p> <p>13 were doing that?</p> <p>14 A There was the sign on the door.</p> <p>15 Q Okay. What sign was that?</p> <p>16 A The sign that's allowed to use when you take a lunch.</p> <p>17 Q What did the sign say?</p> <p>18 A That I'll be returning in 30 minutes.</p> <p>19 Q Okay. Is that like a handwritten sign or something?</p> <p>20 A No. The exact sign that you have in your exhibit.</p> <p>21 Q Okay. So did you get Fiona's permission to leave the</p> <p>22 site on that day?</p> <p>23 A Fiona never told me I could not go to lunch on that day,</p> <p>24 no.</p> <p>25 Q Did you get Fiona's permission to leave the site on that</p>	<p style="text-align: right;">Page 267</p> <p>1 emailed out, just to the wrong email address, which</p> <p>2 should have been an occurrence, not a suspension.</p> <p>3 Q All right. Let's take a break. I'm going to get that</p> <p>4 email.</p> <p>5 A Hm-hmm.</p> <p>6 (Whereupon a recess was taken at or about the</p> <p>7 hour of 5:31 p.m., and the deposition was resumed at or</p> <p>8 about the hour of 5:40 p.m.)</p> <p>9 THE WITNESS: I have to correct my testimony on</p> <p>10 record, because I was getting mixed up between two</p> <p>11 different Fiona conversations from Fiona Bork. On the</p> <p>12 conversation from February 25th, 2014, she yelled at me</p> <p>13 for going to the State of Michigan on her.</p> <p>14 MR. MIGLIO: I've got to take an emergency</p> <p>15 call.</p> <p>16 (Whereupon a recess was taken at or about the</p> <p>17 hour of 5:40 p.m., and the deposition was resumed ab or</p> <p>18 about the hour of 5:44 p.m.)</p> <p>19 (Whereupon the following portion of the</p> <p>20 transcript was read as follows:</p> <p>21 THE WITNESS: I have to correct my testimony on</p> <p>22 record, because I was getting mixed up between two</p> <p>23 different Fiona conversations from Fiona Bork. On the</p> <p>24 conversation from February 25th, 2014, she yelled at me</p> <p>25 for going to the State of Michigan on her.")</p>
<p style="text-align: right;">Page 266</p> <p>1 day, yes or no?</p> <p>2 MR. FLYNN: Asked and answered.</p> <p>3 THE WITNESS: I was on the phone with Fiona. I</p> <p>4 told her I was going to lunch. Not once did she say I</p> <p>5 couldn't go to lunch. Not once did she say I could go to</p> <p>6 lunch.</p> <p>7 Q (Continuing by Mr. Miglio): Okay. Did you get Martha</p> <p>8 Wischeart's permission to go to lunch and leave the site</p> <p>9 that day?</p> <p>10 A Yes, I did.</p> <p>11 Q And what did she say specifically?</p> <p>12 A She said, "You need to take some time to yourself and you</p> <p>13 definitely need to go to HR," and she gave me a big, long</p> <p>14 hug. I mean we hugged for like three minutes, so.</p> <p>15 Q So that's what she said that made you think that you</p> <p>16 could just put the sign up and go to lunch?</p> <p>17 A No. The new lunch policy that was given to me on</p> <p>18 February 24th, the day before I was told I could go to</p> <p>19 lunch.</p> <p>20 Q What did the policy say?</p> <p>21 A The policy said we now sign in and out through HFML and</p> <p>22 we take a 30-minute lunch. And nowhere does the new</p> <p>23 policy say that I had to get permission.</p> <p>24 Q Okay.</p> <p>25 A It says to email in, to email out, and I emailed in and I</p>	<p style="text-align: right;">Page 268</p> <p>1 THE WITNESS: Basically told me she was going</p> <p>2 to make sure I lost my job because I turned her into the</p> <p>3 State for not giving me lunches.</p> <p>4 Q (Continuing by Mr. Miglio): How would she --</p> <p>5 A And that was why I was so upset.</p> <p>6 Q How would she even know that you went to the State when</p> <p>7 you get didn't go to the State yet?</p> <p>8 A I told her I was going to the State.</p> <p>9 Q All right. You realize you've been under oath today,</p> <p>10 don't you?</p> <p>11 A Yes.</p> <p>12 Q And you realize there's no record of any phone call that</p> <p>13 she made to you, right?</p> <p>14 A I have no clue of that, but I know she called me.</p> <p>15 Q All right. Just like you've never been involved in a</p> <p>16 lawsuit, never were terminated from a previous position,</p> <p>17 just like those answers you gave today?</p> <p>18 MR. FLYNN: Objection. We've -- I --</p> <p>19 MR. MIGLIO: Is that what you're sure about?</p> <p>20 MR. FLYNN: Objection. She testified about the</p> <p>21 earlier lawsuit.</p> <p>22 Q (Continuing by Mr. Miglio): Where in any of the</p> <p>23 documentation did you make a note or document that</p> <p>24 conversation you had with Fiona on February 25th in the</p> <p>25 morning?</p>

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<p>1 A I specifically told Jill Hood when I met with her.</p> <p>2 Q Well, you wrote Jill Hood a lot of stuff. Did you put it</p> <p>3 in any of those emails or any of those letters?</p> <p>4 A I don't recall.</p> <p>5 Q Something that significant, wouldn't you want to have</p> <p>6 included that in the information you provided to HR?</p> <p>7 A It was one of the reasons why Martha gave me such a long</p> <p>8 hug.</p> <p>9 Q Okay. But wasn't that a significant phone call in your</p> <p>10 mind?</p> <p>11 MR. FLYNN: Objection. She just testified it</p> <p>12 was.</p> <p>13 Q (Continuing by Mr. Miglio): Wasn't it?</p> <p>14 A Yeah, I remember it.</p> <p>15 Q And wouldn't you think that would be important to tell HR</p> <p>16 as to why you should not be fired and why you should be</p> <p>17 reinstated?</p> <p>18 MR. FLYNN: Objection. She just testified she</p> <p>19 did.</p> <p>20 THE WITNESS: I did tell HR.</p> <p>21 MR. FLYNN: Asked and answered. I'm just</p> <p>22 confused.</p> <p>23 MR. MIGLIO: Don't object just because you're</p> <p>24 confused.</p> <p>25 Q (Continuing by Mr. Miglio): I want to know whether or not</p>	<p>1 Q (Continuing by Mr. Miglio): Okay. Well, let's take a</p> <p>2 look at something. I was going to wait for it, but it's</p> <p>3 just as fine that we brought it up now.</p> <p>4 A Okay.</p> <p>5 MR. FLYNN: By the way, we're approaching the</p> <p>6 seven-hour mark.</p> <p>7 MR. MIGLIO: So what?</p> <p>8 MR. FLYNN: So I mean under the Court Rules</p> <p>9 this deposition is going to be over soon. I'll let you</p> <p>10 get through this line of questions.</p> <p>11 MR. MIGLIO: You terminate it at your own</p> <p>12 peril, okay? That's your -- You do what you have to do.</p> <p>13 MR. FLYNN: Under Rule 30 you know, just like</p> <p>14 know, depositions can only go seven hours.</p> <p>15 MR. MIGLIO: I'm going to go to the Judge and</p> <p>16 we'll see what happens.</p> <p>17 MR. FLYNN: Now, granted I am still -- I am</p> <p>18 still willing to stipulate to reconvening the deposition</p> <p>19 for the sole purpose of going through those recordings.</p> <p>20 MR. MIGLIO: Which --</p> <p>21 MR. FLYNN: I don't want you to think I'm</p> <p>22 backing off of that. I'm not.</p> <p>23 MR. MIGLIO: So let's see. We're on Exhibit</p> <p>24 80.</p> <p>25 (Exhibit 80 marked.)</p>
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<p>1 you put that in writing. I want to know whether or not</p> <p>2 you put the substance of the conversation you just said</p> <p>3 you now recalled, which was different than what you</p> <p>4 testified earlier about, whether you put that --</p> <p>5 A Right, because I was mixed up between the --</p> <p>6 Q -- conversation in writing.</p> <p>7 A The conversation that she called me at home and the</p> <p>8 conversation on the last day that I worked there was two</p> <p>9 different things.</p> <p>10 Q So what was the conversation she -- when she called you</p> <p>11 at home? This is the one that happened sometime the</p> <p>12 latter part of January, beginning part of February.</p> <p>13 A That was about going to HR on her. The day I was</p> <p>14 terminated was about going -- or the day I was suspended</p> <p>15 for taking a lunch was the day that she told me she was</p> <p>16 going to make sure that I lost my job for going to the</p> <p>17 State.</p> <p>18 Q Okay. And you hadn't gone to the State by that time, had</p> <p>19 you?</p> <p>20 A By this day? The State paperwork was already filled out.</p> <p>21 Q Listen to my question. Had you gone to the State, had</p> <p>22 you filed a complaint with the State, as of February</p> <p>23 25th?</p> <p>24 MR. FLYNN: Objection. Asked and answered.</p> <p>25 THE WITNESS: I do believe so, yes.</p>	<p>1 Q (Continuing by Mr. Miglio): Let me show you this. Do you</p> <p>2 recognize this?</p> <p>3 A Yes.</p> <p>4 Q What is this?</p> <p>5 A This is the paperwork I filled out for the State.</p> <p>6 Q Do you see the time stamp on the side of it?</p> <p>7 A Yes.</p> <p>8 Q Do you see that? What's the date there?</p> <p>9 A February 27th, 2014.</p> <p>10 Q Okay. That's the date that it was filed with the agency.</p> <p>11 You understand that?</p> <p>12 A No. That's the date they received it at the agency.</p> <p>13 Q How else would they be filed with the agency if they</p> <p>14 didn't receive it?</p> <p>15 A It's different when you mail it in. I mean --</p> <p>16 Q Do you realize that you lied to the Court in this case</p> <p>17 about when that was filed?</p> <p>18 A No.</p> <p>19 Q Do you remember making an allegation in the complaint</p> <p>20 through your lawyer that it was filed before your</p> <p>21 termination?</p> <p>22 A It was filed before I was terminated.</p> <p>23 Q Well, you know what? The State of Michigan says it</p> <p>24 wasn't. So how do you think there is a discrepancy</p> <p>25 there?</p>

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<p>1 written here because you were under stress?</p> <p>2 MR. FLYNN: Objection. Misconstrues her</p> <p>3 earlier testimony.</p> <p>4 Q (Continuing by Mr. Miglio): Well, it seems kind of</p> <p>5 detailed here, Miss Reeser, that "Since no one seemed to</p> <p>6 care that I was taking a break, certainly no one</p> <p>7 responded to my email or called me on either my office</p> <p>8 line or my work phone to say, 'No, Natalie, you cannot</p> <p>9 take a break.' I thought it was okay to take a rest."</p> <p>10 MR. FLYNN: Objection.</p> <p>11 MR. MIGLIO: Okay?</p> <p>12 MR. FLYNN: As to form.</p> <p>13 Q (Continuing by Mr. Miglio): "Especially since Miss</p> <p>14 Wiseheart was on site and aware of all situations." You</p> <p>15 see that?</p> <p>16 A My mom is not an attorney, so she wouldn't know to use</p> <p>17 the right genre.</p> <p>18 Q How would your mom know what to write down unless you</p> <p>19 told her? I mean is she clairvoyant? Was she there? I</p> <p>20 mean what? Did you give her a piece of paper?</p> <p>21 A I was probably crying to my mom all night.</p> <p>22 Q So you said, "Therefore, I put on my shoes, put on my</p> <p>23 coat, posted the break sign on our entrance door, and</p> <p>24 left for lunch -- or left for a much-needed rest."</p> <p>25 A That I was allowed per the new policy the day before.</p>	<p>1 A Ask the question again.</p> <p>2 Q That the new policy -- You said you understood the new</p> <p>3 policy that was set out on the 24th meant that you just</p> <p>4 needed to email somebody and you could leave the site</p> <p>5 without anybody's authorization, correct?</p> <p>6 A The new policy meant you just had to email HFML Outlook</p> <p>7 your 30 minutes and email when you get back.</p> <p>8 Q Okay. By the way, did you ever email back again when you</p> <p>9 got back in the office? Because I didn't see any such</p> <p>10 emails.</p> <p>11 A No, but according to the new policy that would have just</p> <p>12 been an occurrence.</p> <p>13 Q Well, if you were following the policy, why didn't you</p> <p>14 email that you were back in at lunch and avoid getting an</p> <p>15 occurrence?</p> <p>16 A I had gone through so much turmoil with Fiona's phone</p> <p>17 call, with crying to Martha, with her telling me she was</p> <p>18 going to make me lose my job because I had turned her in</p> <p>19 to the State, those things had escalated me. My anxiety</p> <p>20 levels were off the chart. I don't -- I don't know.</p> <p>21 Q So at the top of the second page of this Exhibit No. 86,</p> <p>22 you wrote, or your mom wrote for you, "Additionally,</p> <p>23 please know I have followed this same procedure in the</p> <p>24 past when truly needing a break, and at no time in the</p> <p>25 past has anyone, including Miss Bork or Miss Wiseheart,</p>
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<p>1 Q Okay. Well, where does it say that? I thought the new</p> <p>2 policy was about emailing in and emailing back -- I mean</p> <p>3 emailing -- You said --</p> <p>4 A The new lunch policy --</p> <p>5 Q -- the new policy, according to you, meant that you could</p> <p>6 take a lunch break just by emailing somebody and you</p> <p>7 could go and leave the site. Did you say that?</p> <p>8 MR. FLYNN: Objection. Asked and answered.</p> <p>9 MR. MIGLIO: Didn't you say that?</p> <p>10 MR. FLYNN: We're going to be here all night,</p> <p>11 because you keep asking the same questions.</p> <p>12 MR. MIGLIO: Didn't you say that, that was what</p> <p>13 you understood the policy to be?</p> <p>14 MR. FLYNN: Counsel, look it up in the record.</p> <p>15 MR. MIGLIO: Isn't that what you said? You</p> <p>16 just needed to email in order to take a lunch break?</p> <p>17 MR. FLYNN: Counsel, look it up in the record.</p> <p>18 MR. MIGLIO: Is that correct? Am I wrong?</p> <p>19 MR. FLYNN: Objection. Asked and answered.</p> <p>20 MR. MIGLIO: Go ahead. You can answer. He's</p> <p>21 not going to instruct you not to answer.</p> <p>22 MR. FLYNN: I haven't instructed her not to</p> <p>23 answer.</p> <p>24 MR. MIGLIO: I said that.</p> <p>25 Q (Continuing by Mr. Miglio): So isn't that what you said?</p>	<p>1 relayed to me that I was breaking any rules by taking a</p> <p>2 break, that there would be consequences if I took a</p> <p>3 break, that I would be abandoning my position by taking a</p> <p>4 break, that I would be suspended from my position for</p> <p>5 taking a break, and/or any other reason for taking a</p> <p>6 break. Therefore, it was my logical understanding I</p> <p>7 could take a break."</p> <p>8 Now, I thought your understanding was you could</p> <p>9 take a break on the 25th because of the email you got on</p> <p>10 the 24th, not because of the policy or the procedure you</p> <p>11 would have you followed in the past. Am I wrong with</p> <p>12 that?</p> <p>13 MR. FLYNN: Objection as to form and asked and</p> <p>14 answered.</p> <p>15 MR. MIGLIO: I mean --</p> <p>16 THE WITNESS: I was given a new policy. I</p> <p>17 followed the new policy.</p> <p>18 Q (Continuing by Mr. Miglio): Well, this seems to say</p> <p>19 that -- and correct me if I'm wrong -- that you didn't</p> <p>20 think you should have been fired because you were</p> <p>21 following an old policy that you had followed, right?</p> <p>22 MR. FLYNN: Objection. You're also misreading</p> <p>23 the document.</p> <p>24 THE WITNESS: The document speaks for itself or</p> <p>25 everything. I don't . . .</p>

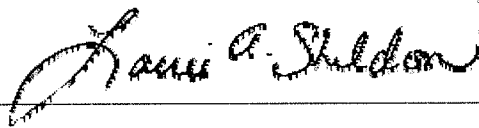
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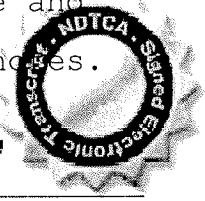
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STATE OF MICHIGAN)
) ss:
COUNTY OF MACOMB)

I hereby certify that the foregoing attached pages are a full and complete transcript of the proceedings held on the date and at the place hereinbefore set forth. I reported stenographically the proceedings held in the matter hereinbefore set forth, and the testimony so reported was subsequently transcribed under my direction and supervision, and the foregoing is a full, true and accurate transcript of my original stenotype notes.


Lauri A. Sheldon CSR-4045, RPR



Notary Public
Macomb County, Michigan
My Commission Expires:
February 8, 2022